

ISMAIL RAMSEY (Bar No. 189820)
izzy@ramsey-ehrllich.com
KATHARINE KATES ((Bar No. 155534)
katharine@ramsey-ehrllich.com
RAMSEY & EHRLICH LLP
803 Hearst Avenue
Berkeley, CA 94710
(510) 548-3600 (Tel)
(510) 291-3060 (Fax)

Attorneys for Defendant Mohammed Nuru

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No.: CR 20-70028 MAG
)	Case No.: CR 20-70076 MAG
Plaintiff,)	
vs.)	STIPULATION AND [PROPOSED]
)	ORDER TO MODIFY BAIL
MOHAMMED NURU,)	CONDITIONS
)	
Defendant.)	
)	
)	

The defendant Mohammed Nuru is currently scheduled to appear before this Court for status and preliminary hearing or indictment on April 13, 2021 at 10:30 am.

This court has previously ordered Mr. Nuru released on bail, with a \$2 million bond, with \$400,000 of that amount secured by a deed of trust on his primary residence.

Mr. Nuru has complied with all of the terms of his pretrial release and supervision, without any violations. Mr. Nuru has requested to travel to his home in Stonyford, Colusa County, to perform maintenance for the weekends of April 9 to April 12, 2021, May 13 to May 17, 2021, and June 30, 2021, to July 5, 2021. His supervising pretrial services officer does not object to this request.

1 Accordingly, the United States and Mr. Nuru stipulate and move this court to modify the
2 bail conditions to allow Mr. Nuru to travel to his home in Stonyford for the two above-described
3 periods.

4 All other conditions of Mr. Nuru's pretrial release, imposed on January 28, 2020, will
5 remain the same.

6 IT IS SO STIPULATED.

7 Dated: April 8, 2021

Respectfully Submitted,

8 RAMSEY & EHRLICH LLP

9
10 //s//
11 ISMAIL RAMSEY
12 KATHARINE KATES
13 Attorneys for MOHAMMED NURU

14 DAVID L. ANDERSON
15 United States Attorney

16 //s//
17 SCOTT D. JOINER
18 S. WAQAR HASIB
19 Assistant United States Attorneys

20 GOOD CAUSE HAVING BEEN SHOWN, IT IS SO ORDERED.

21 Dated: April 13, 2021

22 
23 THE HONORABLE SALLIE KIM
24 UNITED STATES MAGISTRATE JUDGE
25
26
27
28